

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MASSACHUSETTS NURSES ASS'N,

Plaintiff,

v.

NATIONAL NURSES UNITED, AFL-CIO,

Defendant.

Case No. 1:15-cv-11804-WGY

CERTIFICATION IN ACCORDANCE WITH LOCAL RULE 16.1(d)(3)(a)-(b)

I, Michael Anderson, the undersigned counsel of record for the Defendant National Nurses United AFL-CIO, do certify that:

1. I am the duly authorized representative and attorney of the Defendant.
2. On October 14, 2015, I conferred with opposing counsel for the Plaintiff Massachusetts Nurses Ass'n.
3. My client and I have considered the resolution of this litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

4. I have conferred with my client with a view toward establishing a budget for the costs of conducting the full course and various alternative courses of the litigation.


October 14, 2015

/s/ Michael T. Anderson
Michael T. Anderson (BBO #645533)
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Attorney for Defendant National Nurses United

So certified:

October 14, 2015



Pam Allen
National Nurses United Legal Department

CERTIFICATE OF SERVICE

I hereby certify that on this date I served a copy of the foregoing document via the Court's ECF system on the following:

James F. Lamond
McDonald Lamond Canzoneri
352 Turnpike Road, Suite 310
Southborough, MA -1772-1756

Dated: October 14, 2015

/s/ Michael T. Anderson